

## **Modern Slavery Act 2015 – Policy Statement**

**(December 2016)**

Stifel Nicolaus Europe Ltd (SNEL) recognises and embraces its obligations under the Modern Slavery Act 2015 ('MSA-15'). We have a direct obligation under the Act by virtue of our turnover. Irrespective, we recognise an ethical imperative to support that Act both in letter and spirit. All staff should develop an appreciation of modern slavery issues within their area of competence and should feel free to draw attention of Management where there is a serious suspicion of malpractice in relation to the Act's intention.

SNEL has authorised and empowered John Owen to be our Board-level champion and operational executive in this matter, but all staff should recognise a personal responsibility to be aware of and alive to, modern slavery issues and risks within their area of competence.

SNEL asks all stakeholders to make every effort to be aware of the policy developments and ongoing Management instructions regarding MSA 2015.

The SNEL Slavery and Human Trafficking Policy is available to all SNEL associates via the Stifel European Compliance Intranet, and is publicly available to all interested parties upon request.